

151 Southhall Lane, Ste 450 Maitland, FL 32751 P.O. Drawer 200 Winter Park, FL 32790-0200 www.inteserra.com

February 23, 2018 Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary Federal Communications Commission 9050 Junction Drive Annapolis Junction, MD 20701

RE:

Mosaic Networx LLC

EB Docket No. 06-36; CY2017

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the Mosaic Networx LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel Consultant

cc:

Matt Hiles - Mosaic NetworX

tms:

FCCx1801

Enclosures CR/gs

# ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Name of company(s) covered by this certification: MOSAIC NETWORX LLC

Form 499 Filer ID: 828037

Name of signatory: Matt Hiles

Title of signatory: Chief Operating Officer

- 1. I, Matt Hiles, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
- 2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 et seq. of the Commission's rules.
- 3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- 4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Matt Hiles, Chief Operating Officer

Date

Attachments: Accompanying Statement explaining CPNI procedures

# Attachment A

# Statement of CPNI Procedures and Compliance

Calendar Year 2017



# Customer Proprietary Network Information Certification Accompanying Statement

MOSAIC NETWORX LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

MOSAIC NETWORX LLC provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. MOSAIC NETWORX LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is MOSAIC NETWORX LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

#### Safeguarding against pretexting

MOSAIC NETWORX LLC takes reasonable measures to discover and protect against
attempts to gain unauthorized access to CPNI, including the authentication of customers
prior to disclosing CPNI based on customer-initiated contacts. MOSAIC NETWORX
LLC is committed to notify the FCC of any novel or new methods of pretexting it
discovers and of any actions it takes against pretexters and data brokers.

#### Training and discipline

 MOSAIC NETWORX LLC has an express disciplinary process in place for violation of the MOSAIC NETWORX LLC's CPNI practices and procedures. MOSAIC NETWORX LLC employees are required to review and abide by MOSAIC NETWORX LLC's Code of Conduct, which prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

#### MOSAIC NETWORX LLC's use of CPNI

- MOSAIC NETWORX LLC uses CPNI for the following purposes:
  - (1) To initiate, render, maintain, repair, bill and collect for services
  - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - (3) For network maintenance; and
  - (4) As required by law.



- MOSAIC NETWORX LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does MOSAIC NETWORX LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- MOSAIC NETWORX LLC does not share, sell, lease or otherwise provide CPNI to any
  third party except pursuant to appropriate non-disclosure agreements. MOSAIC
  NETWORX LLC will not otherwise disclose CPNI to a third party except when required
  by a lawfully issued government subpoena.

### Additional safeguards

- MOSAIC NETWORX LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- MOSAIC NETWORX LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- MOSAIC NETWORX LLC designates one or more officers, as an agent or agents of the MOSAIC NETWORX LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- MOSAIC NETWORX LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, MOSAIC NETWORX LLC will comply with all applicable breach notification laws.

